

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

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	:	
RALPH S. JANVEY, IN HIS CAPACITY	:	
AS COURT-APPOINTED RECEIVER FOR	:	
THE STANFORD RECEIVERSHIP	:	
ESTATE, AND THE OFFICIAL	:	
STANFORD INVESTORS COMMITTEE,	:	
	:	
<i>Plaintiffs,</i>	:	Civil Action No. 3:13-cv-00477-N
	:	Hon. David C. Godbey
- against -	:	
	:	
PROSKAUER ROSE, LLP,	:	
CHADBOURNE & PARKE, LLP, AND	:	
THOMAS V. SJOBLUM,	:	
	:	
<i>Defendants.</i>	:	
	:	
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STIPULATION REGARDING CERTAIN PRE-TRIAL FILINGS

WHEREAS, on July 7, 2017, the U.S. District Court for the Northern District of Texas, in the above-captioned action, issued an Amended Scheduling Order (“Amended Scheduling Order”), resetting the trial date for this case to begin on April 30, 2018, for a two week docket;

WHEREAS, paragraph 5 of the Amended Scheduling Order provides that “[t]he parties shall file all pretrial materials by March 30, 2018,” including deposition designations;

WHEREAS, Ralph S. Janvey, in his capacity as court-appointed receiver for the Stanford Receivership Estate, the Official Stanford Investors Committee (together with Janvey, “Plaintiffs”), Pablo M. Alvarado, and Proskauer Rose LLP (“Proskauer,” and together with Alvarado, “Defendants”) have met and conferred with respect to pre-trial materials, and in the interest of facilitating an efficient and orderly pre-trial and trial process, Plaintiffs and Defendants (together, the “Parties”) hereby STIPULATE AND AGREE AS FOLLOWS:

1. The Parties shall file and provide each other with their respective affirmative deposition designations and exhibit lists on March 30, 2018 as required by the Amended Scheduling Order;

2. The Parties shall not be required to include demonstrative exhibits on their exhibit lists to be filed and exchanged on March 30, 2018. The Parties shall exchange any demonstrative exhibits the day before they intend to use them at trial;

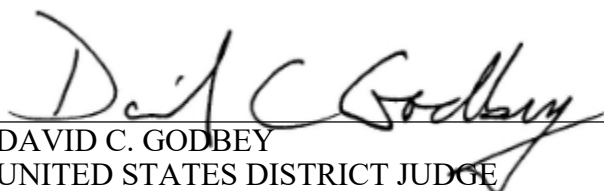
3. The Parties shall file and provide each other with their respective counter-designations and objections to affirmative deposition designations by April 18, 2018;

4. The Parties shall file and exchange objections to exhibits and the proposed jury charge on April 18, 2018;

5. The Parties shall not be required to provide deposition designations as set forth in paragraphs 1 and 3 of this Stipulation for any witness who they intend to call live at trial. Should the Parties later decide not to call a witness live for whom designations are not provided pursuant to this paragraph 5, any Party may provide deposition designations for any such witness on three (3) days' notice. Counter-designations to any designations provided under this paragraph 5 shall be provided within one (1) day of receiving the other Party's designations.

6. The fact the Parties have exchanged deposition designations for a witness shall not require the Parties to play such designations at trial or call such witness live.

SIGNED April 10, 2018.


DAVID C. GODBEY
UNITED STATES DISTRICT JUDGE

AGREED:

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